



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 30, 2020

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
40 Foley Square, Room 2202
New York, NY 10007

Re: Natural Resources Defense Council v. U.S. Environmental Protection Agency,
17 Civ. 5928 (JMF)

Dear Judge Furman:

This Office represents defendant U.S. Environmental Protection Agency ("EPA") in the above-referenced Freedom of Information Act case. Due to recent COVID-19 related work disruptions and the undersigned attorney's expanded childcare obligations, I write to respectfully request that the deadlines in the Court's endorsed briefing schedule [ECF No. 87] be extended by one week. This is EPA's first request for an extension of the briefing deadlines. Plaintiff NRDC consents to this request.

- EPA's second motion for summary judgment, including its *Vaughn* index: April 8, 2020
- NRDC's opposition and cross-motion for summary judgment: May 4, 2020
- EPA's opposition to NRDC's cross-motion and its reply in further support of its summary judgment motion: May 28, 2020
- Plaintiff's Reply in further support of its Cross-Motion: June 12, 2020

We thank the Court for its consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Tomoko Onozawa
TOMOKO ONOZAWA
Assistant United States Attorney
Tel: (212) 637-2721
Fax: (212) 637-2686
Email: tomoko.onozawa@usdoj.gov

Application GRANTED. The parties' proposed briefing schedule is hereby adopted. The Clerk of Court is directed to terminate ECF No. 88. SO ORDERED.

March 30, 2020

cc: All Counsel of Record (via ECF)